



**Jorgensen Forge Outfall Site - Request for Continued Management by EPA  
ERU**

**Ryan Barth** to: Michael Sibley

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Cc: John Gross, "Ernst, William D", "Garson, Nick", "Tom Colligan",  
David Templeton, Rick Goode, John Verduin

History: This message has been forwarded.

Mike –

The following note is sent jointly by Boeing and Jorgensen Forge.

Thank you for arranging the September 20 meeting at your office with you and others regarding the next actions needed at the Jorgensen Forge Outfall Site along the Boeing Plant 2 – Jorgensen Forge property line. To date, under your management Boeing and Jorgensen Forge have successfully completed the Phase 1 cleanout and closure of the clay portion of the Outfall Site and subsequent Phase 2 soil investigation necessary to characterize the remainder of the Outfall Site impacts. Boeing and Jorgensen Forge now have the necessary information to remedy the remainder of the Outfall Site through completion of the final Phase 3 work. The Phase 3 work will include the removal of the remainder of the outfall pipes composed of corrugated metal and the underlying soil PCB contamination directly adjacent to the Lower Duwamish Waterway.

As discussed during the September 20 meeting, the Phase 3 work area, while relatively small, directly abuts the Jorgensen Forge/Earle M Jorgensen (EMJ) CERCLA EE/CA bank and sediment cleanup area, which in turn abuts the Plant 2 RCRA southwest bank and sediment cleanup area. To support integration of these three directly adjacent cleanup projects and minimize the potential for sediment and bank recontamination and schedule delays, the Phase 3 work must be completed before the Jorgensen Forge/EMJ and Boeing cleanup projects occur in the vicinity of the Outfall Site. The Jorgensen Forge/EMJ and Boeing cleanup projects are currently scheduled to begin in late summer 2013 so the Phase 3 work needs to be designed, permitted, and constructed prior to this date, less than a year from now. This schedule is extremely short and we believe it cannot be achieved under the existing Jorgensen Forge/EMJ CERCLA, Boeing RCRA, or Ecology-led administrative processes.

Due to the time-critical nature of the Phase 3 work coupled with our past successes and timely completion of the Phase 1 and Phase 2 work, Boeing and Jorgensen Forge request that Phase 3 be performed as a second amendment to the current CERCLA Order under your authority in the Emergency Response Unit at EPA.

Thank you for your attention to this important matter. We look forward to your response to our request, and Boeing and Jorgensen Forge remain available to provide any information or support needed in that regard. We are collectively evaluating the design approach for the Phase 3 work and will be prepared to discuss remedial alternatives in the coming weeks.

**Ryan Barth, P.E.**

Anchor QEA, LLC

rbarth@anchorqea.com

720 Olive Way, Suite 1900

Seattle, Washington 98101

**USEPA SF**



**1475221**

Office: 206.287.9130

Direct: 206.903.3334

Fax: 206.287.9131

Cell: (b) (6)